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FILED
UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA
2012 JUN 25 AM 9:36

UNITED STATES OF AMERICA

Magistrate Case No. **12MJ2346**

Plaintiff,

BY _____ DEPUTY

COMPLAINT FOR VIOLATION

v.

Title 18, U.S.C. §1591(a) and (b)-
Sex Trafficking of a Minor

Heaven Angela Johnson (1),
Gregory Cottingham (2)
C.J. Cottingham (3)

Defendants.

The undersigned Complainant, being duly sworn, states:

On or about and between June 1, 2012 and June 22, 2012, within the Southern District of California, defendants Heaven Angela Johnson (1), Gregory Cottingham (2), and C.J. Cottingham (3), knowingly, in and affecting interstate and foreign commerce, did recruit, entice, harbor, transport, provide, obtain, and maintain by any means a person, to wit: Minor Female (MF-age 16), knowing and in reckless disregard of the fact that MF would be caused to engage in a commercial sex act, having had a reasonable opportunity to observe MF and knowing and in reckless disregard of the fact that MF had not attained the age of 18 years; in violation of Title 18, United States Code, Sections 1591(a) and (b).

And the complainant states that this complaint is based on the attached Statement of Facts incorporated herein by reference.


Manuel Ramirez

Special Agent, Homeland Security Investigations

Sworn to me and subscribed in my presence this ²⁵ day of June, 2012.


UNITED STATES MAGISTRATE JUDGE

DOM
6/22/12
3 Def's
JAW

STATEMENT OF FACTS

On June 22, 2012, at 6:30 p.m., a Homeland Security Investigation Special Agent acting in an undercover capacity identified an online prostitution ad on backpage.com offering "hey gentleman my name is Kristie, I'm very fun, I will do whatever you want – call me – 18" and listed a phone number and a description of her body in the ad. The ad also listed prices of \$60 for 30 minutes and \$120 for an hour and stated that both "incalls" and "outcalls" were accepted. The agent contacted the phone number and spoke to a woman and set up a time to meet the "date" at the Vagabond Inn in Chula Vista. At approximately 7:15 p.m., a female knocked on the predetermined hotel room door wearing a bright yellow shirt and spandex pants. The agent and the female agreed that \$200 would be paid for an hour of "full service." The female was arrested for prostitution by Chula Vista Police and interviewed.

The female was advised of her Miranda rights which she waived. At first, she gave a false name but with her correct date of birth (March xx, 1996 – age 16), but later provided her true name of D.T.V. (name withheld as she is a minor). Agents determined that the photo in the backpage.com ad described above was of D.T.V. She stated that she was dropped off by Defendant Heaven Johnson in a green Pontiac. She identified Johnson as her pimp as all money D.T.V. earned from prostitution went to Johnson. She stated she met Johnson a few weeks earlier in El Cajon at a bus stop. D.T.V. also stated that she told Johnson her true age about 4-5 days earlier. D.T.V. stated that Johnson posted the online ads on backpage.com using a Chase credit card and also drove her to the prostitution dates. She claimed she did approximately 7-9 prostitution "dates" since knowing Johnson. D.T.V. stated that Johnson would wait for her to finish a date and would text the minor when the time agreed upon with the prostitution customer was almost done. D.T.V. stated that Defendant CJ Cottingham was Defendant Johnson's "Pimp". D.T.V. also stated that the phone used on this date was purchased for prostitution.

Chula Vista Police Department stopped the green Pontiac described by the minor in an adjacent parking lot. In the vehicle police located Johnson and two black adult males, later identified as Gregory and C.J. Cottingham, who were brothers. The vehicle was driven by Gregory Cottingham with Johnson and C.J. Cottingham in the back seat. All three were detained and brought to CVPD for questioning.

1 Defendant Johnson was advised of her Miranda rights and waived them. She stated that she
2 knew D.T.V. was under the age of 18. Johnson admitted to posting the minor online a few times
3 but stated that the last few postings were done by defendant Gregory Cottingham. Johnson stated
4 that Gregory Cottingham would get all of the prostitution proceeds from the minor's sex acts, and
5 denied receiving any financial proceeds herself. She admitted that she worked as a prostitute
6 herself and worked in a strip club. She admitted that on that evening, she, C.J. and Gregory
7 Cottingham dropped the minor off at the hotel for the purpose of the minor to engage in
8 prostitution acts.

9 Defendant Gregory Cottingham was interviewed after he was advised of his Miranda rights
10 and waiving those rights. He stated he drove the vehicle to drop the minor off that evening but
11 denied receiving any money from prostitution. He admitted to knowing she was under the age of
12 18 and provided her full true name to police. He admitted receiving text messages from the minor
13 after the minor was dropped off. The text messages were to ensure that the minor was ok.

14 Defendant C.J. Cottingham was advised of his Miranda rights and waived them. He denied
15 knowing the minor's true name, but admitted knowing that she was under the age of 18 and that she
16 was a prostitute. He denied receiving any benefit from prostitution proceeds but had over \$300.00
17 USD in his possession even though he is unemployed.

18 
19 Manuel Ramirez
20 Special Agent, Homeland Security Investigations

21 On the basis of the facts presented in the statement of facts consisting of two pages, I find
22 probable cause to believe that the defendants committed the offense from June 1, 2012 to June
23 22, 2012 in violation of 18 U.S.C. §1591(a) and (b).

24 Date: 10:50 PM, Jun 23, 2012

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26 UNITED STATES MAGISTRATE JUDGE
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